



City of Wheatland

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Mr. Dan Cucchi, Project Planner
Yuba County Planning Department
915 8th Street, Suite 123
Marysville, CA 95901

**Re: Notice of Preparation for the Yuba County General Plan Update Draft
Environmental Impact Report**

Dear Mr. Cucchi,

Thank you for the opportunity for the City of Wheatland to comment on the Notice of Preparation (NOP) for the Yuba County General Plan Update EIR (GPU EIR). Detailed comments in regard to the following environmental issue areas have been identified by City staff in response to the NOP:

- *Agriculture and Forestry:* The GPU EIR should address whether buildout of the GPU would convert agricultural lands, such as Prime or Unique Farmland or Farmland of Statewide Importance. The primary purpose of planning within Yuba County should be the preservation of large areas of agricultural land. Urban development should be focused to existing and surrounding developed areas while the agricultural land of the County is preserved.
- *Air Quality and Climate Change:* The GPU EIR should address how future development emissions associated with buildout of the GPU would affect air quality within the Sacramento Valley Air Basin (SVAB). Motor vehicle trips, energy use, and other stationary sources would cause emissions of ROG, NO_x, PM₁₀, and CO that would contribute to existing violations of either State- or federal- level ambient air quality standards. In addition, buildout of the GPU would create new sources of greenhouse gas emissions, which contribute to global climate change. The GPU EIR should address how these air quality and climate change impacts will be mitigated in order to reduce impacts to the County and the SVAB as a whole. In particular, the EIR should address how the proposed buildout of the GPU would reduce the vehicle miles traveled as opposed to concentrating the future development within and adjacent to existing developed areas.
- *Hydrology and Water Quality:* The GPU EIR should address how new development associated with buildout of the GPU could result in increased stormwater runoff due to the creation of new impervious surfaces associated with the buildout of the GPU, which

could lead to potential flooding within the City of Wheatland's SOI. The EIR should address the impacts of additional flows into the regional drainage system and how it affects Best Slough, Dry Creek, and Bear River.

- *Land Use and Planning/Population and Housing:* The City of Wheatland is concerned that increased growth in the County will inhibit or delay the growth within the City as identified in the Wheatland General Plan. SACOG has growth projections for the County as a whole. The GPU EIR should address the impacts that the proposed growth within the County will have on the growth within the City. The City has identified residential growth necessary in order to ensure the potential for the creation of jobs and commercial in order to provide a balanced community. Should residential uses not be located within Wheatland and the associated commercial and employment, the City may not be able to adequately fund the provision of services. The GPU EIR should address both the physical impacts as well as the economic impacts on the City's ability to provide services to its community should the growth be directed to the County rather than the City.
- *Public Services:* The GPU EIR needs to address the provision of police and fire services to the proposed growth areas. The City of Wheatland is part of the Wheatland Fire Authority which provides service outside the City limits. In addition, the City still maintains a fire department. The EIR should address the provision of fire protection and ensure that adequate funding is available for operation and maintenance of the Wheatland Fire Authority.
- *Transportation/Traffic:* The GPU EIR should address the potential traffic impacts that buildout of the proposed GPU would have on major roads in and around the City of Wheatland, including SR 65, Spenceville Road, and Wheatland Road, as well as the expressway around the City of Wheatland that has been identified in the Wheatland General Plan. The GPU EIR should address the impacts and ensure that adequate mitigation is provided, including funding, for the City to implement the necessary improvements.
- *Utilities:* *Water* – The City of Wheatland currently has sufficient groundwater to adequately fulfill the City's water needs. The GPU EIR should address how buildout of the GPU would impact groundwater supplies for Wheatland and whether Wheatland would need to secure additional means of water supply at buildout of the GPU. *Wastewater* – The GPU EIR should address all possible options related to wastewater. This includes the possibility of a new regional wastewater treatment plant (WWTP) identified in the Draft South Yuba County Regional Wastewater Treatment Facility Study, as well as the City of Wheatland providing wastewater services for the south County region. *Stormwater* – The GPU EIR should address the potential flooding impacts that could result due to the stormwater runoff that would be created due to the creation of new impervious surfaces associated with the buildout of the GPU as identified in the hydrology discussion. *Solid Waste* – The GPU EIR should address whether buildout of the GPU would create impacts that would affect the currently adequate capacity of the Ostrom Road Landfill to serve the buildout of the City of Wheatland. In addition, the

EIR should address the GPU impacts on the landfill capacity with and without the addition of solid waste from San Francisco.

- *Alternatives:* The GPU EIR should include as an alternative, directing most of the urban growth to within existing areas that provide municipal services.

Thank you for considering the City of Wheatland's comments as you prepare the Draft EIR for the Yuba County GPU. Please do not hesitate to contact me should you have any questions regarding the items in this letter.

Sincerely,

Enita Elphick
Mayor
City of Wheatland

cc: Steve Wright, City Manager
Tim Raney, AICP, Community Development Director
Lisa Thomason, City Clerk
Richard Shanahan, City Attorney
Dane Schilling, Coastland Civil Engineering, Inc.